



**THE CITY OF NEW YORK
LAW DEPARTMENT**

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March 30, 2020

By ECF

Honorable Katherine Polk Failla
United States District Court, Southern District of New York
40 Centre Street
New York, New York 10007

Re: Taveras v. City of New York, 20 CV 1200

Your Honor:

I am an Assistant Corporation Counsel in the office of James E. Johnson, Corporation Counsel of the City of New York, attorney for defendants New York City, James O'Neill, in his official capacity as Police Commissioner of the City of New York¹, Jonathan David, as Director of the New York City Police Department's ("NYPD") License Division, and Asif Iqbal, as Executive Director of the NYPD's License Division's rifle/shotgun section, in the above-referenced matter.

I am writing to request a 30-day extension of defendants' deadline to respond to the Complaint from April 3, 2020 to May 4, 2020. This is the first request for such an extension which is being made to allow for sufficient time to review the file and discuss the matter with appropriate NYPD personnel. Plaintiff's attorney consents to this request.

Additionally, should the Court grant the extension, defendants propose adjourning the initial pretrial conference, currently scheduled for May 6, 2020 at 10:00 a.m., to June 10, 2020, if convenient for the Court.

¹ James O'Neill resigned as New York City Police Commissioner in November 2019. The current Police Commissioner is Dermot Shea.

Thank you for your consideration in this matter.

Respectfully submitted,

/s/

Kerri A. Devine
Assistant Corporation Counsel

cc: **By ECF**
Amy L. Bellantoni, Esq.